

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DINO N. THEODORE,
Plaintiff,

v.

DeMOULAS SUPER MARKETS, INC.,
Defendant

Docket No. 05-10314RGS

**DEFENDANT, DeMOULAS SUPERMARKETS, INC.'S
MANDATORY DISCLOSURES PURSUANT TO RULE 26**

A. Persons Likely To Have Discoverable Information

Jay Rainville
DeMoulas Supermarkets, Inc.
875 East Street
Tewksbury, MA 01876
978.851.8000

Mr. Rainville has information concerning the layout and configuration of the supermarket that is the subject matter of this litigation including the parking lot adjacent to and property upon which the supermarket is located; store operations, procedures and personnel.

Normand Martin
DeMoulas Supermarkets, Inc.
875 East Street
Tewksbury, MA 01876
978.851.8000

Mr. Martin has information concerning the design, construction, layout, configuration, maintenance and renovation (if any) of the supermarket that is the

subject matter of this litigation including the parking lot adjacent to and property upon which the supermarket is located.

Michael Kettenbach
Retail Management & Development, Inc.
881 East Street
Tewksbury, MA 01876
978.851.0200

Mr. Kettenbach has information concerning the ownership, acquisition, design, construction, layout, configuration, maintenance and renovation (if any) of the supermarket that is the subject matter of this litigation including the parking lot adjacent to and property upon which the supermarket is located.

Robert Hartman
DeMoulas Supermarkets, Inc.
875 East Street
Tewksbury, MA 01876
978.851.8000

Mr. Hartman has information concerning operation and configuration of the deli department within the supermarket that is the subject matter of this litigation and store operations, procedures and personnel relating to that department.

Andrew Heggarty
Al Jussaume
Eric Gauthier
Chris Lindell
Neil Hardy
DeMoulas Supermarkets, Inc.
875 East Street
Tewksbury, MA 01876
978.851.8000

These individuals are employees of the Defendant who are assigned or were formerly assigned to the supermarket at issue. They have information concerning the layout and configuration of the supermarket that is the subject matter of this litigation

including the parking lot adjacent to the supermarket; store operations, procedures and personnel.

B. Description And Location Of Relevant Documents

The following documents are or likely would be in the possession and control of DeMoulas Supermarkets and/or in the custody of Retail Management & Development, Inc.: plans, design documents, building permits and applications, schematics, blueprints, contracts, agreements, correspondence, memoranda and related documents relating to the configuration, design, alterations (if any), maintenance and repair of the supermarket at issue in this litigation.

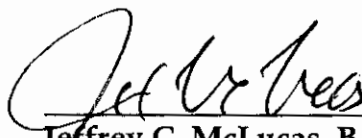
C. Computation Of Damages

The Defendant is claiming no damages in this litigation, but reserves its right to seek reimbursement of the costs and fees, including attorneys' fees, incurred in defending this litigation.

D. Insurance Agreements

The Defendant is aware of no insurance agreements that may be available to it to satisfy any judgment rendered against it in this litigation concerning the Plaintiff's claims under the Americans with Disabilities Act.

**Defendant,
By its attorney,**



Jeffrey C. McLucas, B.B.O. #550650
McLucas & West, P.C.
141 Tremont Street - 4th Floor
Boston, Massachusetts 02111-1227
(617) 338-4242

CERTIFICATE OF SERVICE

I, Jeffrey C. McLucas, Esq., counsel for the Defendant, in the above-entitled action, hereby certify that on this day, September 7, 2005, I served upon counsel for: the Plaintiff, **Dino N. Theodore**: Nicholas S. Guerrero, Esq., Shaheen Guerrero & O'Leary, LLC, Jefferson Office Park, 820A Turnpike Street, North Andover, MA 01845; a copy of Defendant's Mandatory Disclosures, by mailing, first class, postage prepaid, to the attorney(s) of record.

Dated: September 7, 2005



Jeffrey C. McLucas, Esq.